

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET  
FOR THE PERIOD MARCH 1 TO MARCH 31, 2022

Debtor: LTL Management LLC

Applicant: **Blake, Cassels & Graydon LLP**

Case No.: 21-30589-MBK

Client: LTL Management LLC (“LTL”)

Chapter: 11

Case Filed: October 14, 2021 (the “Petition Date”)

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SECTION 1  
FEE SUMMARY

☐ Interim Fee Application No. \_\_\_\_\_ or ☐ Final Fee Application

Summary of Amounts Requested for the Period from March 1 to March 31, 2022 (the “Fifth Statement Period”).

	USD
Total Fees:	\$46,488.85
Total Disbursements:	\$264.46
Total Taxes:	\$6,043.55
Total Fees, Disbursements and Taxes:	\$52,796.86
Minus 20% Holdback of Fees:	(\$9,297.77)
Amount Sought at this Time:	<b>\$43,499.09</b>

	<u>FEES</u>	<u>EXPENSES and TAXES</u>
Total Previous Fees Requested:	\$325,614.27	\$43,021.43
Total Fees Allowed to Date:	\$0.00	\$0.00
Total Retainer (If Applicable):	N/A	N/A
Total Holdback (If Applicable):	\$65,122.86	N/A
Total Received by Applicant:	\$0.00	\$0.00

<b>Name of Professional &amp; Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate (CAD)</b>	<b>Fees (CAD)</b>
Gordon McKee Partner, Litigation & Dispute Resolution (Toronto)	1988	8.8	\$964.00	\$8,483.20
Linc Rogers Partner, Restructuring & Insolvency (Toronto)	2000	23.1	\$862.00	\$19,912.20
Caitlin McIntyre Associate, Restructuring & Insolvency (Toronto)	2017	32.1	\$541.00	\$17,366.10
Nancy Thompson Law Clerk, Restructuring & Insolvency (Toronto)	N/A	29.0	\$360.00	\$10,440.00
Anna Riviglia Filing Clerk (Toronto)	N/A	N/A	<i>Flat Rate</i>	\$25.00

**SECTION II  
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEES (USD)
1. <b>Litigation Consulting: CCAA Recognition Proceedings</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	62.8	\$35,139.92
2. <b>Fee and Retention Application</b> Preparation of employment and fee applications for self or others; motions to establish interim procedures	30.2	\$11,348.93
3. <b>Litigation: Canadian Actions</b> Other than Avoidance Action Litigation		
8. <b>Litigation: General / All Class Actions</b> Other than Avoidance Action Litigation		
<b>SERVICE TOTALS</b>	<b>93.0</b>	<b>\$46,488.85</b>

*Note: Fees for No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1*

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>Matter No.</b>	<b>DISBURSEMENTS SUBJECT TO HST</b>	<b>AMOUNT (CAD)</b>
	N/A	
	<b>DISBURSEMENTS NOT SUBJECT TO HST</b>	<b>AMOUNT (CAD)</b>
1	Court Fees	\$320.00
	<b>DISBURSEMENTS TOTALS</b>	<b>\$320.00</b>

*Note: Disbursements for matter No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1*

**SECTION IV  
CASE HISTORY**

1. Date of Retention: January 28, 2022, effective as of the Petition Date [Dkt. 1284] (the “Retention Order”).<sup>1</sup>
2. Summary explaining the nature of the work performed and the results achieved:
  - Updating Information Officer on progress in the proceedings, and reviewing draft Information Officer’s Report to ensure accuracy;
  - Preparing motion materials and attending hearing on March 7, 2022 for recognition of the extension of the preliminary injunction in the Canadian CCAA proceedings, and circulating the endorsement and issued Order to the Service List and the Information Officer;
  - Considering issues related to the scope of the US Preliminary Injunction, and addition of certain Canadian plaintiffs to Appendix A to the Complaint, and attending to the preparation and delivery of stay letters
  - Correspondence and discussions with the Information Officer in connection with litigation claims issued in the violation of the stay of proceedings;
  - Reviewing and considering appeals filed by the Talc Committee in the Chapter 11 proceeding and the implications on the Canadian CCAA proceedings;
  - Observing Chapter 11 hearing regarding, among other things, constitution of Talc Committees in order to fully inform the Canadian Court;
  - Finalizing monthly fee statements and arranging for service and filing; and
  - Drafting and finalizing the first interim fee application and arranging for service and filing.

I certify under penalty of perjury that the above is true.

Date: April 28, 2022

/s/ Linc Rogers

Linc Rogers

**Blake, Cassels & Graydon LLP**

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<sup>1</sup> The Retention Order is attached hereto as Exhibit A.